

THE LAW OFFICE OF  
**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 4/24/23

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April 23, 2023

**BY ECF**

Honorable Magistrate Judge Vernon S. Broderick  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Lopez v. Partymakers Flowers and Balloons, Inc. (1:23-cv-01782-VSB)**

To the Honorable Judge Vernon S. Broderick,

Plaintiff submits this letter-motion respectfully requesting an extension of time to seek a default judgment against the Defendant. Pursuant to Your Honor's Orders dated April 6, 2023 (Dkt # 6), Plaintiff was to file for a default judgment in this action by no later than April 20, 2023. Plaintiff's counsel sustained a back injury at the end of March which required a procedure. Plaintiff's counsel was then diagnosed with Covid-19 on April 3<sup>rd</sup>, 2023 and was not able to return to Court or the office for a period of 10 days while recovering from both ailments. Unfortunately, on April 14, 2023, Plaintiff's counsel's mother suffered a stroke. (Documentation available upon request) Because of these unfortunate events, Plaintiff's counsel was unaware of the April 6<sup>th</sup>, Order nor the April 20<sup>th</sup>, deadline to seek a default judgment. Plaintiff counsel humbly apologizes for missing Your Honor's Order and respectfully requests a two (2) week extension to May 4, 2023 to file a request for a default judgment. This is the first request for relief of this nature.

The Plaintiff wishes to thank Your Honor and this Court for the time and attention to this matter.

Respectfully submitted,

/s/ Noor A. Saab, Esq.